

Cozen O'Connor  
Attorneys for Plaintiffs  
Peter G. Rossi, Esquire (PGR-8516)  
45 Broadway, 16th Floor  
New York, New York 10006  
(212) 509-9400

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X  
ATLANTIC SPECIALTY INSURANCE COMPANY,  
as subrogee of Brant Publications and  
The Solomon R. Guggenheim Foundation

CIVIL ACTION NO.  
1:07-cv-8508 BSJ

and

NATIONAL SURETY CORPORATION,  
as subrogee of Peter Brant

and

142 MERCER STREET, LLC d/b/a LURE FISH BAR

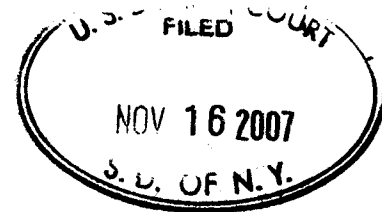
Plaintiffs,

v.

AE OUTFITTERS RETAIL COMPANY

Defendant.

**PLAINTIFFS' MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**



-----X  
**PURSUANT TO RULE 1.3(c)** of the Local Rules of the United States District

Courts for the Southern and Eastern Districts of New York, I, Peter G. Rossi, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of Paul R. Bartolacci, Esquire, Cozen O'Connor, 1900 Market Street, Philadelphia, PA 19103, phone no. 215-665-2001, fax no. 215-665-2013, e-mail: pbartolacci@cozen.com.

634500 #25 11-28-07 MG

Paul R. Bartolacci is a member in good standing of the Bar of the Commonwealth of Pennsylvania. There are no pending disciplinary proceedings against Paul R. Bartolacci in any State or Federal Court.

Dated: 11/7/07  
New York, New York

Respectfully submitted,

COZEN O'CONNOR

BY: 

PETER G. ROSSI, ESQ. (PGR-8516)  
45 Broadway, 16<sup>th</sup> Floor  
New York, NY 10006  
Attorneys for Plaintiffs  
(212) 509-9400

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Attorneys for Plaintiffs  
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**AFFIRMATION OF  
SPONSOR**

Plaintiffs,

v.

AE OUTFITTERS RETAIL COMPANY

Defendant.

-----X

**PETER G. ROSSI**, being duly sworn, hereby deposes and says as follows:

1. I am an attorney duly licensed to practice law in the State of New York and am a member of the law firm of Cozen O'Connor, attorneys for Plaintiffs in the above action.

2. I am fully familiar with the facts and circumstances as hereinafter set forth, and make this Affidavit in support of Plaintiffs' motion to have Paul R. Bartolacci, Esquire admitted of counsel, *Pro Hac Vice*, with respect to the above-entitled action.

3. Plaintiffs originally commenced the above-entitled action against the Defendant, AE Outfitters Retail Company, on October 2, 2007.

4. The affiant has been acting as local counsel with respect to this matter and respectfully requests that the Court allow Paul R. Bartolacci, Esquire to be admitted *Pro Hac Vice* for purposes of serving as counsel for plaintiffs.

5. The affiant knows Mr. Bartolacci to be a member in good standing of the Bar of the Commonwealth of Pennsylvania, and an excellent trial attorney who has a great deal of experience with respect to the issues being presented in the present lawsuit.

6. I respectfully submit to the Court that Mr. Bartolacci is not only an excellent attorney, but also a person whose character is unimpeachable, and who would do justice to both his client and the Bar.

7. I respectfully request that Paul R. Bartolacci, Esquire be admitted *Pro Hac Vice* in the above-entitled action to serve as counsel with respect to the prosecution of the subject claims.

**WHEREFORE**, it is respectfully requested that the motion to admit Paul R. Bartolacci, Esquire, pro hac vice, to represent Plaintiffs in the above-entitled action, be granted.

Dated: New York, New York  
11/7, 2007

Respectfully submitted,



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PETER G. ROSSI (PGR-8516)



Supreme Court of Pennsylvania

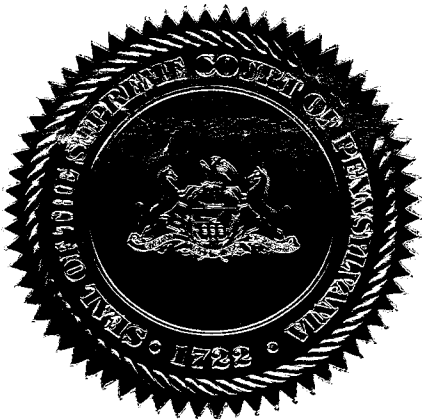
**CERTIFICATE OF GOOD STANDING**

***Paul Robert Bartolacci, Esq.***

**DATE OF ADMISSION**

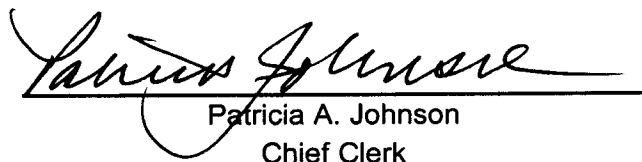
***November 4, 1983***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: October 16, 2007**

  
Patricia A. Johnson  
Chief Clerk

Cozen O'Connor  
Attorneys for Plaintiffs  
Peter G. Rossi, Esquire (PGR-8516)  
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New York, New York 10006  
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NATIONAL SURETY CORPORATION,  
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142 MERCER STREET, LLC d/b/a LURE FISH BAR

**ORDER**

Plaintiffs,

v.

AE OUTFITTERS RETAIL COMPANY

Defendant.  
-----X

Upon the motion of Peter G. Rossi, attorney for the plaintiffs in the above-entitled  
action and Mr. Rossi's Affirmation in support; **IT IS HEREBY ORDERED** that

Applicant's Name:	Paul R. Bartolacci, Esquire
Firm Name:	Cozen O'Connor
Address:	1900 Market Street
City/State/Zip	Philadelphia, PA 19103
Telephone/Fax	215-665-2001 / 215-665-2013
Email Address:	pbartolacci@cozen.com

is admitted to practice pro hac vice as counsel for plaintiffs in the above-entitled action in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
New York, New York

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United States District/Magistrate Judge

Cozen O'Connor  
Attorneys for Plaintiffs  
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142 MERCER STREET, LLC d/b/a LURE FISH BAR

Plaintiffs,

**CERTIFICATE OF  
SERVICE**

v.

AE OUTFITTERS RETAIL COMPANY

Defendant.

-----X

The undersigned attorney hereby certifies that the foregoing *Plaintiffs' Motion to Admit Counsel Pro Hac Vice, Proposed Order, and Affirmation of Sponsor* were served on counsel of record on 11/7/07, via U.S. First Class mail, postage prepaid as follows:



Robert C. Sheps, Esquire  
Sheps Law Group, P.C.  
35 Pinelawn Road  
Suite 106 East  
Melville, NY 11747



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PETER G. ROSSI, ESQUIRE (PGR-8516)